

Added by RPM to  
HIMCO FILE 5/2/97

00001443

David D. Webster  
President

55585

**DURAKOOL**

RECEIVED

OCT 22 1982

October 14, 1982

INDIAN STATE DEPT. OF HEALTH  
AD. SERVICES DIV. 100 CENTER  
BOWLING GREEN, OHIO 43403

Ralph C. Pickard, Technical Secretary  
State of Indiana  
Environmental Management Board  
1330 West Michigan Street  
P.O. Box 1964  
Indianapolis, IN 46206

RE: Your letter of October 5, 1982

Dear Mr. Pickard:

This letter is written in response to your letter of October 5, 1982, to me. Durakool, Inc. has cooperated with the City of Elkhart in every way possible to determine the source of the trichloroethylene contamination of the municipal well field. While some traces of trichloroethylene have been found on Durakool property and on the property of adjoining land, as well as on the property of the Elkhart Water Works itself, Durakool denies that it is or has been the source of the contamination.

In this regard, I would call your attention to the results of the soil borings made by your department on June 24, 1982. An independent test laboratory utilized by Durakool made an examination of the soil samples taken by your personnel and the results showed minimal contamination. I am enclosing a copy of our independent verification of your department's soil borings for your information.

Secondly, I would also call to your attention the fact that no soil samples whatsoever were taken from the property owned by Selmer, Inc., which is immediately adjacent to the municipal well field. While both Durakool, Inc. and Excel Industries, Inc., have not used trichloroethylene in many years, we believe that the manufacturing operations of Selmer, Inc. have required and still require the use of trichloroethylene. Why this property was not tested we do not know, but we suggest that the property be checked as a possible source of the contamination.

Specifically, with respect to the questions raised on page two of your letter of October 5, 1982, we furnish the following:

Ralph C. Pickard  
State of Indiana  
Environmental Management Board  
October 14, 1982  
Page Two

QUESTION: The amounts of TCE used at your facility, per year, since use of TCE was initiated.

ANSWER: There are no specific records maintained by Durakool to show the exact amount of TCE used and the year in which TCE was first used in the manufacturing process. TCE has not been used in the Durakool manufacturing process since 1976. Based on 1976 estimates, the use of TCE in previous years may have been 13 drums or less per year. Durakool records indicate that the use of TCE ended in July or August of 1976 when the use of 111 trichloroethane commenced.

QUESTION: Any knowledge of prior manufacturers at, or owners of, the site having used TCE.

ANSWER: Durakool does not know if prior manufacturers or owners used TCE on the present site of Durakool's facility. Prior land owners of various parcels of the present Durakool property were: Excel Industries, Inc., Elkhart City Water Works, Shell Oil, Yoder Oil Company, Inc., George B. Bucklen, Anne B. Miller, and C.C.C. & St. L. Railroad.

QUESTION: A description of how TCE was used, stored and disposed of at your facility, and, if disposed of off-site, where and in what amounts.

ANSWER: TCE was used in a vapor degreasing machine at Durakool to clean piece parts and sub-assemblies. To the best of our knowledge prior to 1973, TCE was purchased and stored in 55 gallon drums. Sometime in 1973 a bulk storage tank was installed.

Prior to 1973, Durakool does not have any record of the manner of disposal of TCE. In 1973 Durakool records indicate the corporation entered into an agreement with Gold Shield Solvents of Grand Rapids, Michigan, for the reclamation of the TCE sludge solvent. The TCE solvent was collected in containers and sold to Gold Shield Solvents from 1973 to 1976 when the use of TCE was discontinued. Durakool does not have records showing quantities of material shipped to Gold Shield Solvents.

QUESTION: If TCE was significantly spilled or disposed of on-site, indicate when, amounts, where on the site, describe containers used, and the manner in which TCE wastes were covered. Identify and assist in locating any past or current employees who directed or who know details of TCE disposal or spills.

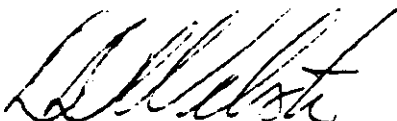
Ralph C. Pickard  
State of Indiana  
Environmental Management Board  
October 14, 1982  
Page Three

ANSWER: Prior to 1973, Durakool does not know the manner in which used TCE was disposed of. If TCE may have been disposed of on-site, one or more of the following methods may have been used: (1) a drain pipe may have run from the degreasing room to an internal lift station connected to the City sewer, (2) the drain pipe may have led to a dry well, or (3) the drain pipe may have led through the wall to collecting containers or directly to the ground.

The following employees may or may not have direct or indirect knowledge of the manner of TCE disposal at Durakool: George Bucklen (current employee), John Landis (current employee), Skip Winesburg (former employee), Bob Katzenmyer (former employee), and John Albert (former employee).

The above information has been furnished by us in a spirit of cooperation with your department. We would respectfully request that you furnish to us the results of your tests of June 24, 1982, so that we may verify our own findings. We will look forward to continued cooperation with you to eliminate the source of the TCE contamination of the Elkhart municipal water system, as our employees and their families drink the same water.

Very truly yours,



David D. Webster

DDW/jf